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Counsel for all Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

BAKER RANCHES, INC., a Nevada
Corporation, DAVID JOHN ELDRIDGE
AND RUTH ELDRIDGE, as Co-Trustees of
the DAVID JOHN ELDRIDGE AND RUTH
ELDRIDGE FAMILY LIVING TRUST, dated January
31, 2007; ZANE JORDAN; and JUDEE SCHALEY,

Plaintiffs,

v.

DEB HAALAND, in her official capacity as
Secretary of the United States Department of
the Interior, the UNITED STATES
DEPARTMENT OF THE INTERIOR,
SHAWN BENGE, in his official capacity as
Acting Director of the National Park Service,
the NATIONAL PARK SERVICE, and
JAMES WOOLSEY, in his official capacity
as Superintendent of the Great Basin National Park,
Defendants.

Case No. 3:21-cv-00150- GMN-WGC

**UNOPPOSED MOTION FOR
EXTENSION OF TIME IN WHICH TO
FILE RESPONSE TO MOTION TO
REMAND (ECF NO. 8)
(First Request)**

1 Defendants Deb Haaland, in her official capacity *et al.* and Plaintiffs Baker Ranches, Inc.
2 *et al.* agree and stipulate to an extension of time until April 29, 2021, for Defendants' response to
3 Plaintiffs' Motion to Remand (ECF No. 8) ("Motion"), filed on April 6, 2021. The following
4 grounds are presented to support this Stipulation.

5 1. This action was originally filed in the Seventh Judicial District for the State of
6 Nevada (White Pine County).

7 2. On March 29, 2021, the U.S. Attorney's office in Reno received a copy of the
8 State-court complaint.

9 3. On April 1, 2021, Defendants filed their Notice of Removal (ECF No. 1)
10 removing this action from the State Court to the Federal Court pursuant to 28 USC § 1442(a).

11 4. On April 6, 2021, Plaintiff filed their Motion to Remand. Defendants' Response
12 is now due April 20, 2021.

13 5. Plaintiffs' Motion includes 238 pages of exhibits.

14 6. Undersigned counsel has several other time-consuming matters scheduled this
15 month, including two dispositive briefs in two separate cases and 8 depositions in a third case.

16 7. Additional time is needed for Defendants to properly review and respond to the
17 Motion.

18 8. Undersigned counsel has been told by Plaintiffs' attorney that they do not oppose
19 this motion.

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1 The parties therefore stipulate and agree that the time for Defendants' to respond to
2 Plaintiffs' Motion should be extended until April 29, 2021.

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4 Dated: April 12, 2021

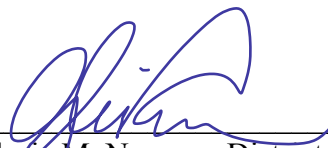
CHRISTOPHER CHIOU
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GREG ADDINGTON
Assistant United States Attorney

JEAN E. WILLIAMS
Acting Assistant Attorney General
United States Department of Justice

9
10 /s/ David L. Negri
11 DAVID L. NEGRI, Trial Attorney
Environment and Natural Resources Division

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13 **IT IS SO ORDERED.**

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15 Dated this 19 day of April, 2021.

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18 Gloria M. Navarro, District Judge
19 UNITED STATES DISTRICT COURT